

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE ADVERTISING MAIL MARKETING ASSOCIATION WITNESS ANDREW  
(USPS/AMMA-T-2-1-3)

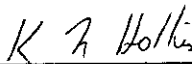
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Advertising Mail Marketing Association witness Andrew: USPS/AMMA-T-2-1-3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083; Fax -5402  
January 14, 1998

**USPS/AMMA-T2-1.** Please confirm that your proposal would decrease the current differential between the per piece discounts for DBMC and DSCF from 0.5 cents per piece to 0.4 cents per piece.

**USPS/AMMA-T2-2.**


- a. *Please confirm that your proposal would result in an increase (versus the Postal Service proposed rates) of ½ cent per piece for non-destination entry, piece-rated ECR pieces.*
- b. *Please confirm that your proposal would result in an increase (versus the Postal Service proposed rates) of 1/10<sup>th</sup> of one cent for DBMC-entered piece-rated ECR pieces.*
- c. *Please confirm that your proposal would result in no change (versus the Postal Service proposed rates) for DSCF- or DDU-entered piece-rated ECR pieces.*

**USPS/AMMA-T2-3.** Please refer to your testimony at page 9, line 15 through page 10, line 6.

- a. *Is it your testimony that any piece dropshipped to the DBMC would have resulted in an additional cost to the Postal Service of 1.86 cents had the piece not been dropshipped?*
- b. *Could the additional cost be less than 1.86 cents? Please explain why or why not.*
- c. *If the additional cost was less than 1.86 cents, but a discount of 1.9 cents were extended to the mailer, would the result meet the objective of “maximizing productive efficiency.”*

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Kenneth N. Hollies

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